

EXHIBIT

1

contracting. Jason Bennett no longer has any ownership interest in Lusa.

6. Describe plaintiff's organizational structure, including the identity and duties of its officers, shareholders, managers, and owners, the ownership percentage held by each owner, the number of full-time employees, the number of part-time employees, and any interconnection, interrelationship and/or affiliation plaintiff has with any other business, including, but not limited to, sharing owners, employees, equipment, managers, officers, office space with another business.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Plaintiff is owned by Celeste Bennett, who is also its President, Vice-President, Treasurer and Secretary, and is the individual responsible for its operations. Currently, Plaintiff has one part-time employee. Celeste Bennett is also an officer of Lusa Associates, Inc.

7. For each year of the relevant time period, state plaintiff's total annual receipts, as determined in 13 C.F.R. § 121.104, gross profits, and net profits from all sources, by source, including the source and portion of each of these categories that are derived from USDA-funded contracts.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Without waiving any of these objections, Plaintiff is providing a revised exhibit to these supplemental responses that will supplement the previous information provided in response to this interrogatory.

9. Identify all federal contracts and subcontracts awarded to plaintiff during the relevant time period. For each such contract and subcontract, state when the work was or will be performed and plaintiff's estimated or actual gross receipts.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Without waiving any of these objections, Plaintiff is providing a revised exhibit to these

supplemental responses that will supplement the previous information provided in response to this interrogatory.

10. Describe the organizational structure of each and every business identified in response to Interrogatory No. 4, including the identity and duties of its officers, shareholders, managers, and owners, the ownership percentage held by each owner, the number of full-time employees, the number of part-time employees, and any interconnection, interrelationship and/or affiliation such business has with any other business, including, but not limited to, sharing owners, employees, equipment managers, officers, office space with another business.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Lusa Associates' ownership is set forth in the supplemental response to Interrogatory No. 4. Celeste Bennett is the President, Vice-President, Treasurer and Secretary of Lusa Associates, and is the individual responsible for its operations. Currently, the number of full-time employees is 24, and the number of part-time employees is 7.

11. For each and every business identified in response to Interrogatory No. 4, state for each year of the relevant time period such business's total annual receipts, as determined in 13 C.F.R. § 121.104, gross profits, and net profits from all sources, by source, including the source and portion of each of these categories that are derived from USDA-funded contracts.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Without waiving any of these objections, Plaintiff is providing a revised exhibit to these supplemental responses that will supplement the previous information provided in response to this interrogatory.

13. Identify all federal contracts and subcontracts awarded to each and every business identified in response to Interrogatory No. 4 during the relevant time period. For each such contract and subcontract, state when the work was or will be performed and plaintiff's estimated

or actual gross receipts.

Response: Plaintiff incorporates the objections to this interrogatory set forth in its initial response to it.

Without waiving any of these objections, Plaintiff is providing a revised exhibit to these supplemental responses that will supplement the previous information provided in response to this interrogatory.

Respectfully submitted,

/s/ Michael E. Rosman
Michael E. Rosman
Michelle A. Scott
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Verification

I am the President of Plaintiff Ultima Services Corporation. I have reviewed the foregoing supplemental answers to interrogatories, and Plaintiff's business records relevant to those responses. The responses are true to the best of my knowledge, information, and belief.

I state under penalties of perjury that the foregoing is true and correct. Executed on May 6, 2022.

/s/ Celeste Bennett
Celeste Bennett

Certificate of Service

I certify that I served this response on May 6, 2022 by email to counsel for defendants.

/s/ Michael E. Rosman

Michael E. Rosman

EXHIBIT 1

(Int. Nos. 7, 11)

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Company	Year	Customer	Sales
LUSA	2016	CSC	\$9,552.27
		CTS	\$1,199,770.85
		Goddard – TRAX	\$77,396.73
		NRCS – California	\$1,242,539.01
		Total Sales	\$2,529,258.86
		Gross Profit	\$321,073.13
		Net Income	-\$383,998.53
LUSA	2017	CTS	\$644,070.56
		Goddard – TRAX	\$71,508.53
		NRCS – California	\$490,262.24
		TRAX - NASA	\$162,895.69
		Total Sales	\$1,368,737.02
		Gross Profit	\$147,624.59
		Net Income	-\$504,488.97
LUSA	2018	CTS	\$1,259,877.90
		TRAX - NASA	\$923,031.53
		Total Sales	\$2,182,909.43
		Gross Profit	\$186,406.35
		Net Income	-\$495,751.41
LUSA	2019	CTS	\$1,024,674.53
		MTSS	\$685,524.54
		NRCS - DC	\$30,640.36
		NRCS - Illinois	\$85,743.57
		NRCS - New Mexico	\$35,475.67
		NRCS - South Dakota	\$478,530.56
		TRAX - NASA	\$828,697.53
		Total Sales	\$3,169,286.76
		Gross Profit	-\$567,846.49
		Net Income	-\$1,219,103.23
LUSA	2020	CTS	\$701,760.75
		MTSS	\$949,181.17
		NRCS - Arkansas	\$1,044,609.38
		NRCS - DC	\$61,897.64
		NRCS - Illinois	\$502,399.48
		NRCS - New Mexico	\$54,122.85
		NRCS - NSSC	\$110,371.93
		NRCS - South Dakota	\$1,162,231.41
		NRCS - Wisconsin	\$1,255,435.45
		TRAX - NASA	\$801,241.96
		Total Sales	\$6,643,252.02
		Gross Profit	\$418,398.07
		Net Income	-\$321,869.66
LUSA	2021	BOR	\$19,500.00
		CTS	\$244,995.77
		MTSS	\$1,383,401.22
		NRCS - Arkansas	\$165,523.95
		NRCS - Illinois	\$349,300.77
		NRCS - NSSC	\$78,704.26
		NRCS - South Dakota	\$693,842.51
		NRCS - Wisconsin	\$1,313,070.08
		TRAX - NASA	\$563,339.38
		Total Sales	\$4,811,677.94
		Gross Profit	\$956,054.85
		Net Income	\$930,889.20

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Ultima	2016	CD - CT	\$126,469.58
		NRCS - Colorado	\$1,010,214.11
		NRCS - Kansas	\$136,466.25
		NRCS - Minnesota	\$2,439,839.36
		NRCS - Nevada	\$83,855.82
		NRCS - NSSC	\$112,368.49
		NRCS - South Dakota	\$485,495.09
		NRCS - Wisconsin	\$948,302.92
		NRCS - Wyoming	\$235,039.93
		Total Sales	\$5,578,051.55
		Gross Profit	\$623,556.28
		Net Income	\$587,686.67
Ultima	2017	CD - CT	\$157,722.36
		NRCS - Alabama NC	\$11,810.88
		NRCS - Arkansas NC	\$94,070.93
		NRCS - Colorado	\$1,143,587.90
		NRCS - Connecticut NC	\$7,124.00
		NRCS - DC - NC	\$38,194.29
		NRCS - Florida NC	\$7,467.54
		NRCS - Illinois NC	\$38,541.94
		NRCS - Indiana - Easement	\$18,474.38
		NRCS - Indiana NC	\$4,699.20
		NRCS - Indiana NC - (Lafayette)	\$13,069.65
		NRCS - INNC_Ft Wayne	\$5,654.62
		NRCS - Kansas	\$95,407.81
		NRCS - Kansas NC	\$96,701.13
		NRCS - Kentucky NC	\$27,724.70
		NRCS - Mississppi NC	\$188,638.19
		NRCS - Nebraska NC	\$47,137.16
		NRCS - Nevada	\$16,041.64
		NRCS - North Dakota NC	\$283,358.64
		NRCS - NSSC	\$295,474.45
		NRCS - Oklahoma NC	\$53,550.09
		NRCS - South Dakota	\$307,056.80
		NRCS - South Dakota NC	\$289,383.49
		NRCS - Tennessee NC	\$38,280.16
		NRCS - Wisconsin	\$459,830.49
		NRCS - Wyoming	\$139,555.96
		Total Sales	\$3,878,558.40
		Gross Profit	-\$175,267.79
		Net Income	-\$219,874.45

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Ultima	2018	CD - CT	\$71,146.54
		NRCS - Alabama NC	\$119,254.78
		NRCS - Arizona NC	\$32,558.40
		NRCS - Arkansas NC	\$1,169,988.25
		NRCS - Colorado	\$446,908.62
		NRCS - Colorado NC	\$681,359.23
		NRCS - Connecticut NC	\$69,049.20
		NRCS - DC - NC	\$163,514.15
		NRCS - Florida NC	\$93,243.53
		NRCS - Georgia NC	\$87,838.94
		NRCS - Hawaii NC	\$148,418.75
		NRCS - Illinois NC	\$129,154.47
		NRCS - Indiana - Easement	\$67,431.06
		NRCS - Indiana NC	\$52,278.62
		NRCS - Indiana NC - (Lafayette)	\$36,852.02
		NRCS - INNC_Ft Wayne	\$35,317.42
		NRCS - Kansas NC	\$261,973.11
		NRCS - Kentucky NC	\$268,020.78
		NRCS - Michigan NC	\$39,598.45
		NRCS - Minnesota NC	\$1,974,956.79
		NRCS - Mississppi NC	\$1,510,628.97
		NRCS - Missouri NC	\$573,007.74
		NRCS - Montana NC	\$119,929.55
		NRCS - Nebraska NC	\$358,276.97
		NRCS - New Mexico NC	\$64,850.31
		NRCS - North Dakota NC	\$1,194,952.80
		NRCS - NSSC	\$72,346.13
		NRCS - Oklahoma NC	\$355,391.63
		NRCS - Oregon Pendleton	\$8,593.92
		NRCS - Oregon Portland	\$82,862.69
		NRCS - Oregon Redmond	\$16,105.75
		NRCS - South Carolina NC	\$50,362.57
		NRCS - South Dakota NC	\$494,843.44
		NRCS - South Dakota NC2	\$772,860.67
		NRCS - Tennessee NC	\$611,919.80
		NRCS - Texas NC	\$141,478.18
		NRCS - Texas NC2	\$98,479.57
		NRCS - Utah NC	\$74,811.92
		NRCS - Virginia NC	\$90,598.68
		NRCS - Washington NC	\$70,720.73
		NRCS - West Virginia NC	\$366,989.16
		NRCS - Wisconsin	\$1,040,893.48
		NRCS - Wisconsin NC	\$221,071.01
		NRCS - Wyoming	\$21,877.21
		NRCS - Wyoming NC	\$285,487.09
		Total Sales	\$14,648,203.08
		Gross Profit	\$312,490.89
		Net Income	\$170,564.46

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Ultima	2019	CD - CT	\$28,473.60
		NRCS - Alabama NC	\$218,627.81
		NRCS - Arizona NC	\$35,663.04
		NRCS - Arkansas NC	\$1,379,733.47
		NRCS - Colorado NC	\$543,372.62
		NRCS - Connecticut NC	\$49,507.21
		NRCS - DC	\$14,217.40
		NRCS - DC - NC	\$96,256.50
		NRCS - DC - NC2	\$72,329.41
		NRCS - Florida NC	\$136,214.50
		NRCS - Georgia NC	\$46,987.85
		NRCS - Hawaii NC	\$148,845.61
		NRCS - Illinois NC	\$73,101.03
		NRCS - Indiana - Easement	\$76,497.77
		NRCS - Indiana NC	\$18,908.51
		NRCS - Indiana NC - (Lafayette)	\$1,351.02
		NRCS - Kentucky NC	\$239,951.45
		NRCS - Michigan NC	\$157,211.05
		NRCS - Minnesota NC	\$547,231.15
		NRCS - Missouri NC	\$42,707.72
		NRCS - Montana NC	\$98,214.12
		NRCS - Nebraska NC	\$388,362.96
		NRCS - New Mexico NC	\$55,966.78
		NRCS - North Dakota NC	\$480,673.51
		NRCS - NSSC NC	\$32,773.67
		NRCS - Ohio NC	\$53,215.99
		NRCS - Oklahoma NC	\$262,594.50
		NRCS - Oregon Pendleton	\$52,642.53
		NRCS - Oregon Portland	\$97,390.81
		NRCS - Oregon Redmond	\$24,680.26
		NRCS - South Carolina NC	\$153,767.95
		NRCS - South Dakota NC	\$190,541.93
		NRCS - South Dakota NC2	\$338,855.36
		NRCS - Tennessee NC	\$817,025.04
		NRCS - Texas NC	\$10,065.29
		NRCS - Texas NC2	\$189,997.31
		NRCS - Utah NC	\$76,372.59
		NRCS - Virginia NC	\$90,635.20
		NRCS - Washington NC	\$134,126.35
		NRCS - West Virginia NC	\$187,331.72
		NRCS - Wisconsin	\$1,242,434.71
		NRCS - Wisconsin NC	\$119,820.39
		NRCS - Wyoming NC	\$161,913.50
		Total Sales	\$9,186,591.19
		Gross Profit	\$2,387,250.74
		Net Income	\$2,256,378.69

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Ultima	2020	NRCS - Arkansas NC	\$153,662.89
		NRCS - DC	\$94,462.40
		NRCS - DC - NC2	\$11,663.68
		NRCS - Florida NC	\$53,528.36
		NRCS - Georgia NC	\$24,995.23
		NRCS - Indiana - Easement	\$84,701.58
		NRCS - Kentucky NC	\$240,864.54
		NRCS - Mississippi NC	\$541.94
		NRCS - Montana NC	\$29,113.01
		NRCS - Nebraska NC	-\$1,243.81
		NRCS - Ohio NC	\$18,273.82
		NRCS - Tennessee NC	\$209,265.95
		NRCS - Texas NC2	\$104,799.77
		NRCS - Utah NC	\$1,430.40
		NRCS - Virginia NC	\$12,296.00
		NRCS - West Virginia NC	\$26,829.82
		Total Sales	\$1,065,185.58
		Gross Profit	\$514,672.86
		Net Income	\$488,367.50
Ultima	2021	NRCS - DC	\$57,506.20
		NRCS - Indiana - Easement	\$46,556.69
		NRCS - Montana NC	\$10,362.59
		NRCS - Oregon Redmond	\$32,309.54
		NRCS - Texas NC2	\$117,780.48
		Total Sales	\$264,515.50
		Gross Profit	\$70,031.07
		Net Income	\$266,432.59

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Key

Company	Customer Acronym	Contract Number
LUSA	BOR (Bureau of Reclamation)	14OR3021P0002
LUSA	CSC	
LUSA	CTS	D-0005-002
LUSA	Goddard – TRAX	NNG12AZ11C-004
LUSA	MTSS	SC19-07
LUSA	NRCS - Arkansas	12FPC319C0015
LUSA	NRCS – California	AG-9104-D-15-0025, AG9104C120004
LUSA	NRCS - DC	12FPC219P0094
LUSA	NRCS - Illinois	12FPC319C0002
LUSA	NRCS - New Mexico	12FPC319P0107
LUSA	NRCS - NSSC	12FPC319P0327
LUSA	NRCS - South Dakota	12FPC219C0007
LUSA	NRCS - Wisconsin	12FPC319C0013
LUSA	TRAX - NASA	80GSFC170010-003
Ultima	CD - CT	none
Ultima	NRCS - Alabama NC	122B4618F0242, AG-2B46-D-17-0113
Ultima	NRCS - Arizona NC	124D9018F0096
Ultima	NRCS - Arkansas NC	AG-2B46-D-17-0136
Ultima	NRCS - Colorado	AG8B05C130002
Ultima	NRCS - Colorado NC	124D9018F0118
Ultima	NRCS - Connecticut NC	AG-1A23-D-17-0068
Ultima	NRCS - DC	12FPC219P0195
Ultima	NRCS - DC - NC	AG-1A23-D-17-0093
Ultima	NRCS - DC - NC2	12FPC219F0018
Ultima	NRCS - Florida NC	AG-2B46-D-17-0151
Ultima	NRCS - Georgia NC	AG-2B46-D-17-0161
Ultima	NRCS - Hawaii NC	AG-4D90-D-17-0177
Ultima	NRCS - Illinois NC	AG-3C78-D-17-0141
Ultima	NRCS - Indiana - Easement	AG-1A23-D-17-0073, 121A2318F0208
Ultima	NRCS - Indiana NC	AG-1A23-D-17-0118
Ultima	NRCS - Indiana NC - (Lafayette)	AG-1A23-D-17-0122
Ultima	NRCS - INNC_Ft Wayne	AG-1A23-D-17-0120
Ultima	NRCS - Kansas	AG6215D150005, AG-6215-C-10-0028, AG3C78P160070
Ultima	NRCS - Kansas NC	AG-3C78-D-17-0098
Ultima	NRCS - Kentucky NC	AG-2B46-D-17-0120
Ultima	NRCS - Michigan NC	121A2318F0177
Ultima	NRCS - Minnesota	AG6322D150019, AG-6322-C-12-0001
Ultima	NRCS - Minnesota NC	AG3C78D170228
Ultima	NRCS - Mississppi NC	AG-2B46-D-17-0099
Ultima	NRCS - Missouri NC	AG-2B46-D-17-0152
Ultima	NRCS - Montana NC	AG-4D90-D-17-0142
Ultima	NRCS - Nebraska NC	AG-3C78-D-17-0122
Ultima	NRCS - Nevada	AG-9327-C-14-0005, AG-9327-D-15-0002
Ultima	NRCS - New Mexico NC	124D9018F0044
Ultima	NRCS - North Dakota NC	AG-3C78-D-17-0121
Ultima	NRCS - NSSC	AG-4D90-C-16-0020
Ultima	NRCS - NSSC NC	124D9018F0289
Ultima	NRCS - Ohio NC	121A2318F0251
Ultima	NRCS - Oklahoma NC	AG-3C78-D-17-0149
Ultima	NRCS - Oregon Pendleton	124D9018F0013
Ultima	NRCS - Oregon Portland	AG-4D90-D-17-0114
Ultima	NRCS - Oregon Redmond	AG-4D90-D-17-0179
Ultima	NRCS - South Carolina NC	AG-2B46-D-17-0139
Ultima	NRCS - South Dakota	AG-6740-D-15-0005, AG-6740-C-11-0007
Ultima	NRCS - South Dakota NC	AG-3C78-D-17-0095
Ultima	NRCS - South Dakota NC2	AG-3C78-D-17-0224
Ultima	NRCS - Tennessee NC	NRCS - Tennessee NC
Ultima	NRCS - Texas NC	AG2B46D170115
Ultima	NRCS - Texas NC2	AG-1A23-P-17-0109

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Ultima	NRCS - Utah NC	AG4D90D170194
Ultima	NRCS - Virginia NC	AG-2B46-D-17-0117
Ultima	NRCS - Washington NC	124D9018F0090
Ultima	NRCS - West Virginia NC	AG-2B46-D-17-0116
Ultima	NRCS - Wisconsin	AG5F48C140005
Ultima	NRCS - Wisconsin NC	AG-3C78-D-17-0125
Ultima	NRCS - Wyoming	AG8E49C110003
Ultima	NRCS - Wyoming NC	AG-4D90-D-17-0106